

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Case No. 20-CR-750-6
MILICA SUMAKOVIC,)
Defendant.) Judge Nancy Maldonado

DEFENDANT'S REPLY MOTION TO RECONSIDER SENTENCE

NOW COMES, the Defendant, **MILICA SUMAKOVIC**, by and through her attorney, **RICHARD M. BEUKE**, and in support of Defendant's Motion to Reconsider Sentence, Ms. Sumakovic states the following:

1. On May 24, 2024, Ms. Sumakovic filed a motion entitled Defendant's Motion to Reconsider Sentence. (Doc. 226).
2. On June 12, 2024, the Government filed its Response to that Motion. (Doc. 228).
3. Since that date, Ms. Sumakovic has surrendered to the custody of the United States Bureau of Prisons. Upon surrender, Ms. Sumakovic was taken to Federal Correctional Institute (FCI) Aliceville in the Northern District of Alabama. That FCI is a low security federal institution with an adjacent minimum security satellite camp. However, upon sentencing, the Court envisioned Ms. Sumakovic being taken to FPC Alderson, which is a minimum security federal prison camp. (Doc. 223).
4. When the sentence a Defendant receives does not reflect the intent of the sentencing court, “[s]uch a correction is clearly within the power of the court.” *United States v. Lawrenson*, 196 F. Supp. 838, 840 (D. Md. 1961), *aff’d*, 298 F.2d 880 (4th Cir. 1962), *citing United States v. Leather*, 271 F.2d 80 (7th Cir. 1959).

5. Ms. Sumakoivc humbly requests that this Court reconsider her sentence, taking into account the amount of time Ms. Sumakovic spent in pretrial home incarceration and the fact that she has been taken to a federal prison facility with greater restrictions and less resources than the facility in which the Court intended her to be housed.

WHEREFORE, for all the reasons stated in Defendant's Motion to Reconsider Sentence and all of the reasons stated above, Milica Sumakovic respectfully asks this Court to reconsider her sentence to account for her pretrial custody and her assignment to a facility other than a minimum security federal prison camp.

Respectfully submitted,

/s/ Richard M. Beuke

Richard M. Beuke

Attorney for the Defendant, Milica Sumakovic

RICHARD M. BEUKE
801 N. Cass Avenue, Suite 200
Westmont, Illinois 60559
(312) 427-3050 – phone
(312) 427-1215 – fax

CERTIFICATE OF SERVICE

I, Nicole Terrazas, hereby certify that Defendant's Reply Motion to Reconsider Sentence was served on June 28, 2024, in accordance with Federal Rule of Criminal Procedure 49, Federal Rule of Civil Procedure 5, and Local Rule 5-1 pursuant to the District Court's system for ECF filers.

/s/ Nicole Terrazas

Nicole Terrazas

801 N. Cass Avenue, Suite 200

Westmont, Illinois 60559

(312) 427-3050 – phone

(312) 427-1215 – fax